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*Attorney for Defendant Kassandra Lotero-Parrish

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 United States of America,

14 Plaintiff,

15 v.

16 Kassandra Lotero-Parrish,

17 Defendant.

Case No. 2:21-mj-01006-DJA

**Unopposed Motion to Permit
Appearance by Video
Teleconference**

18 Ms. Lotero-Parrish has been charged in a four-count complaint with several
19 misdemeanors: Operating a Motor Vehicle while Under the Influence of Alcohol (36
20 C.F.R. § 4.23(a)(1)), Operating a Motor Vehicle with a BAC of 0.08 Grams and Higher
21 (36 C.F.R. § 4.23(a)(2)), Driving with a Suspended Driver's License (36 C.F.R. § 4.2(b);
22 NRS § 483.560(1)), and Littering (36 C.F.R. § 2.14(a)(1)). (ECF No. 1.)

23 Ms. Lotero-Parrish's case is currently set for an initial appearance before
24 United States Magistrate Judge Brenda Weksler on February 22, 2024, at 2:30 PM.
25 The parties plan for Ms. Lotero-Parrish to enter into a plea agreement at that
26 appearance.
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1 This Court may allow Ms. Lotero-Parrish to appear by video teleconferencing
2 under Federal Rule of Criminal Procedure 43(b)(2): “A defendant need not be present
3 under any of the following circumstances . . . The offense is punishable by fine or by
4 imprisonment for not more than one year, or both, and with the defendant’s written
5 consent, the court permits arraignment, plea, trial, and sentencing to occur by video
6 teleconferencing or in the defendant’s absence.”

7 Ms. Lotero-Parrish seeks permission to appear by video teleconferencing
8 because she is indigent, lives in the Los Angeles area, has a newborn, and lacks a
9 driver’s license. Requiring Ms. Lotero-Parrish to travel to Las Vegas would impose a
10 significant financial and logistical hardship on her. Moreover, the government has no
11 objection to Ms. Lotero-Parrish appearing remotely by video teleconference.
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1 Accordingly, Ms. Lotero-Parrish respectfully requests that the Court permit
2 her to appear remotely by video teleconference for the February 22, 2024 initial
3 appearance before United States Magistrate Judge Brenda Weksler.

4 Dated February 14, 2024.

5 Respectfully submitted,

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7 Rene L. Valladares
8 Federal Public Defender

9 /s/ Rick A. Mula

10 Rick A. Mula
11 Assistant Federal Public Defender

12 **IT IS SO ORDERED.**

13 DATED: February 20, 2024

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16 BRENDA WEKSLER
17 UNITED STATES DISTRICT JUDGE
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